



# CITY OF REDDING

## OFFICE OF THE CITY MANAGER

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March 24, 2004

W-030

Regional Water Quality Control Board

Attn: Phillip Woodward

415 Knollcrest Dr., Suite 100

Redding, CA 96002

Re: Proposed Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Beneficial Uses in West Squaw Creek, Shasta County

Dear Mr. Woodward:

This letter is in response to the Notice of Public Hearing and Notice of Filing of Draft Environmental Documents issued by your office. City of Redding staff have evaluated the RWQCB draft staff report dated April 2004 and entitled "Amendments to Sacramento River and San Joaquin River Basins for Beneficial Uses at West Squaw Creek, Shasta County." In the draft RWQCB staff report, RWQCB staff recommends to the RWQCB that it remove designated beneficial uses for support of freshwater habitat and spawning from a stretch of West Squaw Creek that has historically been impacted by acid mine drainage.

As part of the process of the City's preparation to respond to the RWQCB staff report and recommendation, you were given opportunity to respond to a prior draft of this letter. On March 12, 2004, I also met with Assistant Executive Officer Jim Pedri to discuss the RWQCB staff recommendation to the RWQCB.

The City has been assured by you and Mr. Pedri that the Basin Plan amendment will not weaken the requirements of MRRC and Millennium Holding, Inc., to comply with their respective NPDES Permits. Mr. Pedri advised on March 12, 2004, that he would ensure that the draft staff report is modified to include a RWQCB-ordered requirement in the MRRC NPDES permit which will require MRRC to upgrade its best management practices to include the best available technology when such technology becomes available. The City has also been assured that enforcement of MRRC's NPDES permit will prevent additional metal loading to the City of Redding's waste water treatment system.

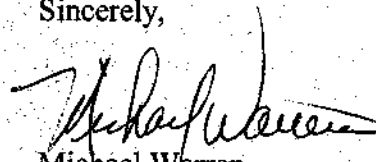


The Sacramento River is the City's primary source of drinking water. Should the MRRC NPDES permit not require upgrades to best management practices as better technology becomes available, 50,000 City of Redding residents could be impacted by the resulting degradation of water quality.

In light of the assurances that have been given, and in reliance upon those assurances, the City of Redding is satisfied that approval of the RWQCB staff recommendation will not result in higher NPDES treatment costs for the City of Redding.

Therefore, the City requests that this letter be entered into the administrative record in support of the RWQCB staff recommendation.

Sincerely,



Michael Warren  
City Manager